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Attorneys for Defendant
Citibank, N.A.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

LAW OFFICES OF OLIVER ZHOU,

Plaintiff,

- against -

CITI BANK, N.A., and
PNC BANK, N.A.

Defendants.

Case No.: 15-CV-5266 (EA)

DECLARATION OF
BARRY J. GLICKMAN

STATE OF NEW YORK,
COUNTY OF NEW YORK.

BARRY J. GLICKMAN, pursuant to 28 U.S.C. § 1746, declares the following:

1. I am an attorney and a member of Zeichner Ellman & Krause LLP, attorneys for defendant Citibank, N.A., and a member of this Court. I make this declaration in support of Citibank's motion for an order pursuant to Fed. R. Civ. P. 12(b)(6) dismissing plaintiff's complaint as to Citibank only.

2. Attached as Exhibit A are true and correct copies of a summons and complaint dated May 18, 2015 filed in Supreme Court, New York County on or about June 10, 2015.

3. Attached as Exhibit B is a true and correct copy of a Notice of Removal dated and filed with this Court July 7, 2015 without exhibits by which defendant PNC Bank, with Citibank's consent, removed this case to this Court pursuant to 28 U.S.C. §§ 1332, 1348, 1441 and 1446.

4. Attached as Exhibit C is a true and correct copy of the minutes of a Pre-Motion Conference conducted by this Court on August 5, 2015.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 18, 2015


BARRY J. GLUCKMAN